



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

December 31, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –
Administrative Settlement Agreement and Order on Consent for Remedial
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Parties Group's (CPG) *draft Remedial Investigation (RI) Report Appendix J*, prepared by Anchor QEA in January 2018 and provided comments on July 30, 2018. The *revised Appendix J*, was received from the CPG on October 5, 2018 and the CPG's responses to EPA's comments were received on November 2, 2018. Partner agency comments were not received on the revised *Appendix J*. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report *Appendix J* with this letter.

Please proceed with revisions to Appendix J of the draft RI Report consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS
Enclosure

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

EPA COMMENTS – DECEMBER 2018

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Appendix J, dated October/November 2018

No.	Section	General or Specific	Page No.	Comment
1	N/A	General	N/A	Considering Appendix J provides mapping information for both surface and subsurface sediments, the name of the Appendix should be revised to “Mapping of Contaminant Concentrations in Lower Passaic River Sediments” (i.e., remove “Surface” from the appendix title).
2	N/A	General	N/A	The 17-Mile RI should refer to OU2 as the Lower 8.3 Miles especially when referencing the ROD, which is “Record of Decision, Lower 8.3 Miles of the Lower Passaic River”.
3	N/A	General	N/A	The response to prior comment #93 will be confirmed upon submission of the revised Appendix E (Analytical Data).
4	Section 2.3.1	Specific	4	Text in Section 2.3.1 was revised based on prior comment #108. However, prior comment #108 has only been partially addressed. Clarify in this section if the layer F interpolated values were used in the calculation of the chemical mass inventories presented in Section 6 of the RI.
5	Section 3	Specific	6-11	Attachment 1 was added to Appendix J to include the distribution of concentrations by geomorphic group for COPCs other than 2,3,7,8-TCDD. However, there is no narrative interpretation in Appendix J of the information presented in Attachment 1. Appendix J should be revised to include a discussion of the figures presented in Attachment 1. For instance, it appears from Attachment 1 that concentration is essentially independent of geomorphic grouping for PCBs, and this observation should be discussed, along with the overall robustness of the mapping groups when applied to other contaminants. The discussion should include sufficient detail to note how the groups perform with the RI data. In addition, the discussion should acknowledge the more detailed data that have been and will be collected for the Lower 8.3 Mile remedial design that will supersede the RI data and the mapping analysis presented in Appendix J.
6	Section 5.3.1, first paragraph, fifth sentence	Specific	19	The text as edited (i.e., removal of the nugget from this sentence) makes the statement incorrect. This sentence should be revised to indicate that the nugget (0.68) is 21% of the sill (3.28), defined as the sum of the nugget and partial sill (2.6).
7	Section 6.1, second bullet	Specific	22	This bullet cites Figure 4.2.8-9a as an example where the data in Layer B are sparser than Layer A resulting in a need to revise Thiessen polygon extents for layer B. Please present a figure that shows the original layer A polygons, the original Layer B polygons, and the revised Layer B polygons for the same spatial extent as Figure 4.2.8-9a.
8	Section 7.2, last paragraph, first sentence	Specific	28	Revise this sentence to clarify that the data were used rather than resampling in cases where Thiessen polygons were used in layer A and a sample exists in Layer B.

EPA COMMENTS – DECEMBER 2018

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Appendix J, dated October/November 2018

No.	Section	General or Specific	Page No.	Comment
9	Figure 3-2 and Attachment 1, Figures 1, 4, 7, 10, 13, 16, 19 and 22	Specific	N/A	Figure 3-2 was revised, and other figures were added to Appendix J based on prior comment #92. Figure 3-2 and the analogous figures in Attachment 1 should be revised to use a consistent set of symbol shapes and colors. In addition, the legend on the bottom panel of Figure 3-2 should be revised to read upstream channel rather than downstream.
10	Figure 3-4 and Attachment 1, Figures 3, 6, 9, 12, 15, 18, 21 and 24	Specific	N/A	Figure 3-4 was revised, and other figures were added to Appendix J based on prior comment #92. Figure 3-4 and the analogous figures in Attachment 1 should be revised to use a consistent set of symbol shapes and colors.

N/A – Not applicable